

District Judge Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Petitioner,

v.

CORVUS EYE PRODUCTIONS LLC,

Respondent.

NO. C18-00644-RSL

[PROPOSED] ORDER

THIS MATTER comes before the Court on Petitioner United States of America's Motion for Judgment by Default against Respondent Corvus Eye Production, LLC (hereinafter "Respondent").

The Court, having reviewed the pleadings and materials in this case, it is hereby **ORDERED** that:

Petitioner's Motion for Judgment by Default is **GRANTED**; and

Respondent is **ORDERED** to produce all "documents" or "records" in its custody or control that are responsive to the Federal Aviation Administration administrative subpoena attached hereto as Appendix A, to CHARLES RALEY, c/o Lisa Melanson, FAA Enforcement Division, Western Team, 1200 District Avenue, Burlington, MA 01803, within 30 days of the date of this Order.

1
2 DATED this 9th day of August, 2018.
3

4 Robert S. Lasnik
5 Robert S. Lasnik
6 United States District Judge
7

8 Presented by:

9 /s/ David East

10 DAVID R. EAST WSBA #31481

11 Assistant United States Attorney

12 United States Attorney's Office

13 700 Stewart Street, Suite 5220

14 Seattle, Washington 98101

15 Phone: (206) 553-7970

16 Fax: (206) 553-4073

17 Email: david.east@usdoj.gov
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APPENDIX A



U.S. Department
of Transportation
Federal Aviation
Administration

Office of the Chief Counsel

Enforcement Division
Western Team
1200 District Avenue
Burlington, MA 01803

**BY FEDERAL EXPRESS and CERTIFIED MAIL, RETURN-RECEIPT
REQUESTED**

March 24, 2017

Jeremiah Kaynor
Executive Producer & CEO
Corvus Eye Productions LLC
7824 East Fir Street
Port Orchard, WA 98366

**Re: IN THE MATTER OF THE INVESTIGATION RELATING TO UAS
FLIGHT OPERATIONS BY CORVUS EYE PRODUCTIONS LLC**

Enclosed is a subpoena with regard to the above-referenced matter. No personal appearance is necessary if the requested information is provided prior to the return date of this subpoena. Please mail the requested information to the attention of Charles Raley at the address at the top of this letter. If you have any questions, please contact Mr. Raley at (310) 725-7108 or at charles.raley@faa.gov.

Thank you for your cooperation.

Naomi Tsuda
Assistant Chief Counsel for Enforcement

By:

Charles Raley, Senior Attorney
Enforcement Division, Western Team
email: charles.raley@faa.gov
Telephone: (310) 725-7108 (main)
(310) 725-6816 (fax)

Enclosures

**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
OFFICE OF THE CHIEF COUNSEL
ENFORCEMENT DIVISION**

**IN THE MATTER OF THE
INVESTIGATION RELATING TO UAS
FLIGHT OPERATIONS CONDUCTED BY
CORVUS EYE PRODUCTIONS LLC**

SUBPOENA DUCES TECUM

**TO: Jeremiah Kaynor
Executive Producer & CEO
Corvus Eye Productions LLC
7824 East Fir Street
Port Orchard, WA 98366**

At the instance of the Federal Aviation Administration, you are hereby required to produce records or documents required for the subject investigation.

AUTHORITY

This subpoena is issued pursuant to the provisions of 14 Code of Federal Regulations (C.F.R.) Section 13.3, and is authorized under the provisions of 49 United States Code (U.S.C.) Sections 40113(a), 46101, 46104, 46313, and is judicially enforceable under 49 U.S.C. Section 46104(b). Moreover, refusal to comply with this subpoena may result in criminal prosecution pursuant to 49 U.S.C. Section 46313.

DEFINITION OF "DOCUMENTS" AND/OR "RECORD"

For the purposes of this subpoena, "documents" or "records" means information stored in any form; any written, recorded or graphic matter, however produced or reproduced; and copies and drafts thereof, and may include correspondence; telegrams; electronic mail; memoranda; reports; notes; drafts; minutes; contracts; agreements; books; records; vouchers; invoices; purchase orders; diaries; logs; computer printouts; memory programs; information stored in computer application, in whatever form; backup materials of any kind; card files; press clippings; newspapers or newsletters; sworn or unsworn statements or employees; lists; audits; deposit slips or cancelled checks; monthly or other periodic statements; ledgers; journals; notices; affidavits; court papers; appointment books; minutes or records of conferences or telephone calls; receipts; written reports or opinions of investigators or experts; status reports; drawings; charts; photographs; or recordings within your possession, or subject to your control, of which you have knowledge, or to which you now have, or have had access, or of which any of your agents, attorneys, accountants, or consultants have knowledge.

RECORDS OR DOCUMENTS TO BE PRODUCED:

Any and all records or reports in your custody or control related in any manner to UAS operations conducted by Corvus Eye Productions LLC, including but not limited to:

- 1) All unmanned aircraft systems (UAS) operations conducted by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 2) All solicitation for business by Corvus Eye Productions LLC for operations to be conducted pursuant to FAA Exemption No. 11890.
- 3) All aerial photography and/or videography obtained through the use or assistance of any UAS operated by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 4) All compensation received relating to UAS operations conducted by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890.
- 5) All contracts and invoices involving the use of any UAS operated by Corvus Eye Productions LLC pursuant to FAA Exemption No. 11890, including all contracts with UAS operators.
- 6) The name and contact information for each UAS operator that Corvus Eye Productions LLC utilized, hired, or contracted with for operations conducted pursuant to FAA Exemption No. 11890.
- 7) Copies of the FAA issued airman certificate for each UAS operator that Corvus Eye Productions LLC utilized, hired, or contracted with for operations conducted pursuant to FAA Exemption No. 11890.
- 8) The brand, model, description, FAA registration number, and other identifying data concerning any UAS that Corvus Eye Productions LLC used for any operation pursuant to FAA Exemption No. 11890.
- 9) All copies of FAA Exemption No. 11890 provided to any person or entity that utilized, hired, contracted with or purchased services relating to Corvus Eye Productions LLC UAS operations.
- 10) All Corvus Eye Productions LLC UAS operations conducted from a moving vehicle.
- 11) All Corvus Eye Productions LLC UAS operations conducted at night.
- 12) All Corvus Eye Productions LLC UAS operations involving UAS weighing 10 pounds or less conducted within 500 feet of non-participating persons.
- 13) All Plan of Activities submitted by Corvus Eye Productions LLC to any FAA Flight Standards District Office.

DEADLINE FOR RECEIPT BY THE FAA OF RECORD PRODUCTION:

April 28, 2017.

PLACE FOR PRODUCTION OF RECORDS: The specified records must be mailed or hand-delivered or otherwise produced to Charles Raley, C/o Lisa Melanson, FAA Enforcement Division, Western Team, 1200 District Avenue, Burlington, MA 01803.

The undersigned, an officer designated by the Administrator of the Federal Aviation Administration, executed this subpoena in Washington, D.C., this 23rd day of March, 2017.

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CAROL
TSUDA

Digitally signed by
NAOMI CAROL TSUDA
Date: 2017.03.23
16:31:55 -0400

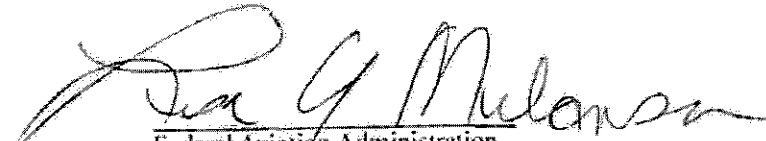
Naomi Tsuda
Assistant Chief Counsel for Enforcement

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Subpoena has been served to Corvus Eye Productions LLC via Federal Express and Certified Mail, Return-Receipt Requested, on this date, to the following:

Jeremiah Kaynor
Executive Producer & CEO
Corvus Eye Productions LLC
7824 East Fir Street
Port Orchard, WA 98366

Dated this 27th day of March, 2017.


Federal Aviation Administration

SENDER: COM NEW DELIVERY MAILING TO: JEREMIAH KAYNOR 7824 EAST FIR STREET PORT ORCHARD, WA 98366		ON DELIVERY	
1. Article Addressed to: Jeremiah Kaynor Executive Producer & CEO Corvus Eye Productions 7824 East Fir Street Port Orchard, WA 98366		2. Article Number (Transfer from service label) 7015 0640 0005 9480 6166	
3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Insured Mail Restricted Delivery		4. Delivery Address (Different from Item 1?) If YES, enter delivery address below:	
5. Priority Mail Express <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Signature Confirmation Restricted Delivery		6. Date of Delivery <input type="checkbox"/> Yes <input type="checkbox"/> No	